

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 1:22-cv-06932-JLR

RICHARD FICHTL,

Plaintiff,

vs.

FIRST UNUM LIFE  
INSURANCE COMPANY,

Defendant.

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**DECLARATION OF STEPHEN F. JESSUP**

STEPHEN F. JESSUP, an attorney for Plaintiff Richard Fichtl and admitted to practice in this Court *pro hac vice*, declares pursuant to 28 U.S.C. § 1746 under penalty of perjury that the following is true and correct:

1. My name is Stephen F. Jessup. I make this declaration in support of Plaintiff's application for attorney's fees in the above-captioned lawsuit.
2. I received my bachelor's degree from the University of Miami in 2002 and my *juris doctor* degree from St. Thomas University in 2006. From 2006 until 2008 I worked as a public defender in Broward County, Florida, taking part in numerous criminal trials.
3. I am currently a partner in the law firm of Attorneys Dell and Schaefer, Chartered ("Dell & Schaefer") in Weston, Florida. I have been with Dell & Schaefer since 2008. During that time, my practice has focused exclusively on representing disability claimants, the great majority of them participants in ERISA-governed employee benefit plans.

4. I estimate that I have represented approximately 1,000 disability claimants in administrative claim procedures and/or federal lawsuits. I have represented plaintiffs in more than 100 mediations in federal ERISA disability actions.

5. In the present case, as documented in billing records filed contemporaneously herewith (as an attachment to the Declaration of Gregory M. Dell), I have expended a total of 19.7 hours performing legal services. The majority of this time was spent handling the court-ordered mediation and conducting settlement negotiations. Based on my sixteen years of experience as an ERISA disability litigator, all time expended was necessary and appropriate.

6. The time entries for my work as set forth in the billing records filed contemporaneously herewith are based on my contemporaneous written recording of the time expended on each task listed.

Dated: April 22, 2024

/s/Stephen F. Jessup  
Stephen F. Jessup